

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PLATFORM REAL ESTATE INC.,

Plaintiff,

-against-

SECURITIES AND EXCHANGE COMMISSION,

Defendant.

No. 19-CV-2575 (LAP)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Memorandum of Law and Declaration filed herewith, Defendant Securities and Exchange Commission, by its attorneys, hereby moves to dismiss the complaint pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).

Dated: October 4, 2019

Respectfully submitted,

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By: /s/ Kerry J. Dingle
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